

ORIGINAL

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

UNITED STATES OF AMERICA

v.

SAMUEL GEORGE HURD, III (01)

TOBY LUJAN (02)

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§  
§  
§  
§

**3:12CR-003-P**

DEPUTY CLERK  
2012 JAN -4 PM 4:02  
*[Signature]*

CLERK US DISTRICT COURT  
NORTHERN DIST. OF TX  
FILED

INDICTMENT

The Grand Jury Charges:

Count One

Conspiracy to Possess with Intent to Distribute a Controlled Substance  
(Violation of 21 U.S.C. § 846)

Beginning in or about July 2011, the exact date being unknown to the Grand Jury, and continuing to on or about December 14, 2011, in the Dallas Division of the Northern District of Texas, and elsewhere, the defendants, **Samuel George Hurd, III and Toby Lujan**, did knowingly, intentionally and unlawfully combine, conspire, confederate, and agree together, and with other persons known and unknown to the Grand Jury, to possess with the intent to distribute five kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(A)(ii)(II).

In violation of 21 U.S.C. § 846.

Count Two

Attempt to Possess with Intent to Distribute a Controlled Substance  
(Violation of 21 U.S.C. § 846)

On or about December 14, 2011, in the Dallas Division of the Northern District of Texas, and elsewhere, the defendants, **Samuel George Hurd, III and Toby Lujan**, did knowingly and intentionally attempt to possess with intent to distribute 500 or more grams of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(b)(1)(B)(ii)(II).

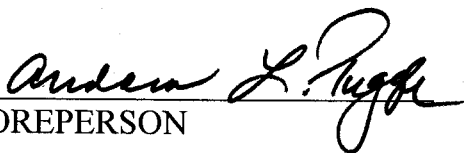
In violation of 21 U.S.C. § 846.

Forfeiture Notice  
(21 U.S.C. § 853(a))

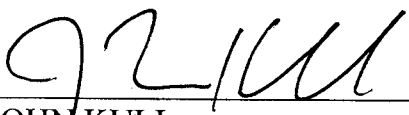
Upon conviction of either of the offenses alleged in Count One or Two of this Indictment, the defendants, **Samuel George Hurd, III and Toby Lujan**, shall forfeit to the United States all property, real or personal, constituting, or derived from, the proceeds obtained, directly or indirectly, as a result of the respective offense; and any property, real or personal, used or intended to be used, in any manner or part, to commit or to facilitate the commission of the respective offense. This property includes, but is not limited to, the following:


- (1) \$88,000 in United States currency seized from Toby Lujan on July 27, 2011.
- (2) A 2010 Cadillac Escalade, VIN: 1GYUKCEFXAR259113, seized from Samuel George Hurd, III on December 14, 2011.

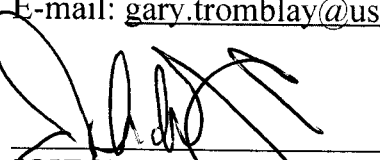
A TRUE BILL.

  
FOREPERSON

SARAH R. SALDAÑA  
UNITED STATES ATTORNEY

  
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Facsimile: 214.659.8803

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

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THE UNITED STATES OF AMERICA

v.

SAMUEL GEORGE HURD, III (1)  
TOBY LUJAN (2)

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INDICTMENT

18 U.S.C. § 846

Conspiracy to Possess with Intent to Distribute a Controlled Substance

18 U.S.C. § 846

Attempt to Possess with Intent to Distribute a Controlled Substance

21 U.S.C. § 853(a)

Forfeiture Notice

2 Counts

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A true bill rendered

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DALLAS

*Andrew L. Fuggle*  
FOREPERSON

Filed in open court this \_\_\_\_\_ day of January, 2012

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Clerk

PLEASE ISSUE ARREST WARRANT FOR TOBY LUJAN; Hurd is on Bond

*Emilia Camille R...* 1-4-12  
UNITED STATES DISTRICT/MAGISTRATE JUDGE

Magistrate case Pending in Chicago - 0752 1:11-00875-0001

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF TEXAS**
**Related Case Information**  
 Superseding Indictment: ☐ Yes ☒ No New Defendant: ☒ Yes ☐ No

 Pending CR Case in NDTX: ☐ Yes ☒ No If Yes, number:

Search Warrant Case Number \_\_\_\_\_

R 20 from District of \_\_\_\_\_

Magistrate Case Number: 0752 1:11-CR-00875-0001 (Chicago)

**1. Defendant Information**

 Juvenile: ☐ Yes ☒ No

If Yes, Matter to be sealed:

☒ Yes ☐ No

Defendant Name

Samuel George Hurd, III (1)

Alias Name

Address

County in which offense was committed:

Cook County, IL and Dallas, TX

**2. U.S. Attorney Information**
John Kull
Bar #: TX 00791057
**3. Interpreter**
☐ Yes ☒ No

If Yes, list language and/or dialect: \_\_\_\_\_

**4. Location Status -On Bond**

- ☐ Already in Federal Custody as of  
☐ Already in State Custody  
☐ On Pretrial Release

**5. U.S.C. Citations**

Total # of Counts as to This Defendant: 2



Petty



Misdemeanor



Felony

**Citation**
**Description of Offense Charged**
**Count(s)**

21 USC § 846

 Conspiracy to Possess with Intent to  
 Distribute a Controlled Substance

1

21 USC § 846

 Attempt to Possess with Intent to Distribute  
 a Controlled Substance

2

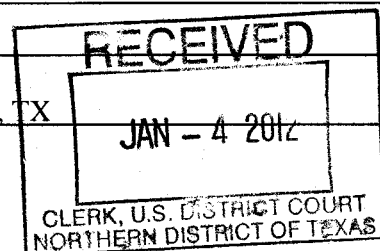
21 USC § 853(a)

Forfeiture Notice

Date

1/3/12

Signature of AUSA:



# **UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF TEXAS**

## **Related Case Information**

Superseding Indictment: ☐ Yes ☒ No New Defendant: ☒ Yes ☐ No

Pending CR Case in NDTX: ☐ Yes ☒ No If Yes, number:

Search Warrant Case Number

R 20 from District of

Magistrate Case Number:

**3-12CR-003-P**

**RECEIVED**

**JAN - 4 2012**

CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS

### **1. Defendant Information**

Juvenile: ☐ Yes ☒ No

If Yes, Matter to be sealed:

☒ Yes ☐ No

Defendant Name Toby Lujan (2)

Alias Name

Address

County in which offense was committed: Cook County, IL and Dallas, TX

### **2. U.S. Attorney Information**

John Kull

Bar #: TX 00791057

### **3. Interpreter**

☐ Yes ☒ No

If Yes, list language and/or dialect: \_\_\_\_\_

### **4. Location Status -ARREST WARRANT NEEDED**

☐

Already in Federal Custody as of

☐

Already in State Custody

☐

On Pretrial Release

### **5. U.S.C. Citations**

Total # of Counts as to This Defendant: 2

☐

Petty

☐

Misdemeanor

☒

Felony

#### **Citation**

21 USC § 846

#### **Description of Offense Charged**

Conspiracy to Possess with Intent to  
Distribute a Controlled Substance

#### **Count(s)**

1

21 USC § 846

Attempt to Possess with Intent to Distribute  
a Controlled Substance

2

21 USC § 853(a)

Forfeiture Notice

Date 1/3/12

Signature of AUSA: 92/104